

Section 4

Industrial/Commercial Sources

4.1 Purpose

Industrial and commercial businesses can potentially contribute varying types and amounts of pollutants to the stormwater system through poor housekeeping practices. As part of the overall stormwater management plan, stormwater pollution from industrial/commercial sources is controlled by educating businesses on prevention methods to reduce or eliminate pollutant discharges to the storm drain system. Education and outreach activities are supplemented with inspections and enforcement.

4.2 Industrial/Commercial Source Control Program

The industrial/commercial sources program consists of five program elements developed to cover various activities that have the potential to impact stormwater quality. Each of these elements is discussed in the following sections.

4.2.1 Source Identification

The goal of this program element is to identify the potential industrial/commercial sources of stormwater pollution. The permittees have established a comprehensive list, which is stored in the MS4 Solution database, of industrial and commercial businesses within each of their respective jurisdictions that have the potential to be significant sources of stormwater pollution. This information was compiled from available data sources such as business license applications, hazardous material inspection programs, and commercially available computer databases.

Each Co-Permittee updates its list of potential industrial/commercial sources regularly as new businesses are started and others go out of business. With this inventory, facilities subject to the General Industrial Permit are identified by using the following resources:

- The SWRCB database of businesses covered by the General Industrial Permit;
- Hazardous materials inventories maintained by the fire or HazMat departments;
- Lists of businesses subject to the local wastewater utility's industrial pretreatment program;
- City business license records, if applicable (Note that San Bernardino County does not issue business licenses);
- Commercially available business listings (e.g., the Dun & Bradstreet database); and
- Telephone listings (phone book).

4.2.2 Source Reduction

The goal of this program element is to establish stormwater BMPs that can reduce pollutants in stormwater discharges from industrial/commercial facilities. At a minimum, source reduction efforts include the following activities:

- Pollution prevention measures and public education
- Source identification and prioritization
- Monitoring and inspection of industrial/commercial sites; priority is on sites which are not under RWQCB jurisdiction.
- Verification of coverage under the State's General Permit
- Enforcement of local ordinances and other requirements for industrial/commercial sites
- Procedures for reporting non-compliance
- Verification of compliance with WQMP

The Management Committee will rely on the CASQA Stormwater BMP Handbooks for a comprehensive list of BMPs applicable to industrial/commercial facilities. As needed, the CASQA handbook information may be supplemented by other sources, for example, Environmental Protection Agency (EPA) materials.

4.2.3 Outreach, Site Visit, and Inspection

The goal of the outreach, site visit, and inspection program element is to encourage business owners and municipalities to work together to develop and implement appropriate and practicable stormwater pollution BMPs. This program activity combines outreach with educational site visits to minimize duplicated efforts and prioritize sites for further inspection and follow-up investigations.

Inspections can be a time-consuming, expensive, and difficult process, especially if there are numerous facilities and a limited number of qualified inspectors. In addition, most industrial and commercial properties in the permit area are already subject to one or more inspection programs. Adding another, separate inspection program could create resistance in the business community rather than encourage positive cooperation.

Instead of hiring several additional stormwater inspectors specifically to address stormwater issues, the Co-Permittees may utilize existing inspection programs to conduct the educational site visits, for example, inspection programs implemented by County Public Health, county and local fire and hazardous materials, code enforcement, industrial pretreatment, and building and safety. Temporary help may also be hired to conduct educational site visits. Each Co-Permittee has developed a responsibility matrix for their jurisdiction explaining which existing departments will be responsible for the educational site visits. This matrix, which is updated as needed, will be incorporated into the LIP.

The Outreach and Inspection Program is completed in phases as shown in Figure 4-1. The first phase of the program focuses on outreach by communicating with and providing outreach materials to each targeted business. Typically, the Co-Permittees will call each target business and talk with an appropriate representative about several topics, which may include the following:

- Business name and address
- Business activities at the site and applicable SIC code(s)
- Potential sources of stormwater pollution
- Potential impacts
- Appropriate BMPs
- Criteria for coverage under the State's General Industrial Permit
- How and where to obtain additional assistance

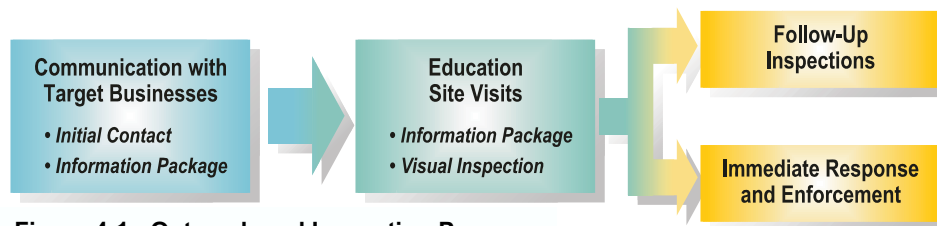


Figure 4-1 - Outreach and Inspection Program Phases

Each Co-Permittee follows-up the initial communication by sending a business-specific package of applicable BMPs and general stormwater information. For new businesses, this outreach may be accomplished over the counter during the business license application process. The RWQCB is notified of any new or closing businesses that are likely to be subject to the General Industrial Permit.

The second phase of the outreach and inspection program consists of educational site visit. Visits may be conducted by the Co-Permittee's stormwater staff or by staff from another department as identified in the responsibility matrix. The purpose, activities, and handout materials for the site visits are essentially the same as for the initial outreach; however, visiting staff also perform a visual inspection of the site to accomplish the following:

- Verify business location, name, contact person, and status (active, closed)
- Confirm the business type, activities, and SIC code
- Verify Waste Discharge Identification (WDID) number and confirm that a stormwater pollution prevention plan has been prepared (General Industrial Permit sites only)
- Look for outdoor storage areas and other outdoor activities that have the potential to cause stormwater pollution

- Look for proper BMP selection and implementation
- Look for signs of ongoing or past illegal discharges
- Establish priority for follow-up inspections or enforcement action (none, low, medium, high)

Follow-up inspections are conducted as needed based on the results of the educational site visits. Follow-up inspections are conducted by the stormwater coordinator or other trained stormwater inspection staff. Follow-up inspections focus first on eliminating existing discharges, second on providing additional assistance to the business on regulatory compliance, and third on enforcement actions. However, in some cases, immediate response and enforcement action may be necessary.

Each outreach contact, educational site visit, and any necessary follow-up inspection is documented and the documentation is provided to the Co-Permittee's stormwater coordinator. Annual summary information is provided to the Principal Permittee for inclusion in the annual reports to the RWQCB. Only documented outreach contacts and site visits are applied toward achieving the performance commitments identified below.

4.2.4 Inspection Prioritization

Experience gained under the existing stormwater permit has demonstrated the need to develop a new approach for prioritizing inspections so that resources are directed to the most important facilities/sites first. This shift in emphasis is particularly important considering the need to become TMDL-focused. The current inspection prioritization system treats all facilities within a particular category as equal (even though their contributions to stormwater pollutants may vary substantially) and assigns levels of priority that may be inappropriate given the experience learned over time regarding the risk of stormwater pollutant discharge from a particular facility type.

To update the inspection prioritization process, the permittees will develop a risk-based scoring system to govern the selection of sites to be inspected and the frequency of inspections. To establish appropriate priorities for scheduling inspections, the scoring system will consider factors including, but not limited to: the hazardous nature of materials used on site, the potential for pollutant discharges (particularly of pollutants for which a TMDL has been established), on-going efforts to implement effective BMPs, and site size and location, including proximity to receiving water. The scoring system will be reviewed and updated annually and a copy will be included with the annual report.

The scoring system shall separate industrial/commercial facilities into three risk categories: high, medium and low. High priority sites must be inspected at least once each year. Medium priority sites must be inspected at least once every three years. Low priority sites must be inspected at least once during the term of the permit (five

years). Any facility subject to section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA) or any site found in significant non-compliance with the Statewide General Permit(s) or the MS4 Permit is automatically deemed a high priority site and must be inspected at least once per month until full compliance is restored.

4.2.5 Coordination with the General Industrial Permit

All permittees have legal authority and ordinances in place to prohibit illegal discharges. An element common to all ordinances is that dischargers subject to any general NPDES permit must file an NOI and comply with permit requirements.

Although the Co-Permittees may conduct outreach activities and site visits to facilities covered by a General Industrial Permit, these permits are not under the permittee's jurisdiction and enforcement of the General Industrial Permit is the responsibility of the RWQCB. The Co-Permittees will cooperate with the RWQCB's enforcement efforts through implementation of the following:

- Helping to identify new and existing businesses that require coverage under the General Industrial Permit and to identify businesses that have ceased operation and should be removed from the permit list;
- Sharing summary, and if requested, detailed outreach, site visit, and inspection information;
- Initiating abatement, cleanup, and follow-up activities for observed illegal discharges; and
- Notifying the RWQCB of Industrial General Permit infractions and recommending enforcement actions, where appropriate.

4.2.6 Training

Permittee staffs implementing the outreach and inspection program outlined above need training to perform these tasks effectively. For example, staff conducting educational site visits may come across evidence of illicit connections. These staffs need to be trained to recognize, report, and respond to such findings.

Staff conducting the outreach and inspection program is targeted for stormwater-specific training and education. This may include staff from several departments and programs, including the fire department, code enforcement, wastewater pretreatment, road maintenance, landscape maintenance, and facilities.

The targeted staff receives general stormwater training and task-specific education and coordination that introduce staff to basic stormwater concepts including regulations, pollutants of concern, potential sources, BMPs, and general program activities. The MAPPS online training program, which is discussed further in Section 6, is the key method used to provide general stormwater training. The online training is supplemented by various other training efforts, including live presentations, on the

job site visits and tailgate meetings by the permittees. For those already trained, refresher training is provided at least once during the permit term to keep staff up-to-date. Training and education activities are documented and reported annually to the principal permittee.

Since new business practice methods and pollution prevention methods are being developed continually, the Training Subcommittee will continue to assess and, if necessary, update educational materials previously developed for staff training.

4.3 Performance Commitments

The permittees propose to implement the following performance commitments to implement the program elements established to address industrial/commercial sources of stormwater pollution:

- 4-1. The permittees will develop a risk-based scoring system to govern the frequency of inspections and the selection of sites to be inspected. To establish appropriate priorities for scheduling inspections, the scoring system will consider factors including, but not limited to: the hazardous nature of materials used on site, the potential for pollutant discharges (particularly of pollutants for which a TMDL has been established), on-going efforts to implement effective BMPs, site size and location, including proximity to receiving water. The scoring system must be reviewed and updated annually and a copy will be included with the annual report.
- 4-2. For facilities where the RWQCB does not have the primary responsibility, the Co-Permittees will use the CASQA Stormwater BMP Handbooks as the primary source for industry-specific BMPs for businesses targeted by the industrial/commercial outreach program. Supplemental BMPs will be obtained from other sources, e.g., EPA materials, as needed.
- 4-3. For industrial/commercial facilities where the RWQCB does not have the primary responsibility, as part of outreach programs the Co-Permittees will provide information regarding appropriate information sources of industry/commercial facility-specific BMPs.
- 4-4. For industrial facilities where the RWQCB does not have the primary responsibility, each Co-Permittee will provide one initial outreach to each facility in their jurisdiction within the targeted industries.
- 4-5. For industrial facilities where the RWQCB does not have the primary responsibility, each Co-Permittee will conduct one educational site visit to each facility in their jurisdiction within the targeted industries. Follow-up inspections will be conducted if necessary based on the results of the educational site visits.

- 4-6. RWQCB has the primary responsibility for conducting outreach, inspecting and enforcing General Industrial Permits. The permittee's will cooperate with the RWQCB's enforcement efforts.
- 4-7. Each permittee will provide general stormwater training for all targeted employees using online training modules (MAPPS training). Training materials will be updated or supplemented as needed to facilitate information sharing. New employees will be trained at the next scheduled course offering or within six months of starting, whichever occurs first. Refresher training will be provided at least once during the permit term for staff that has already received the basic training course materials.
- 4-8. Staff will be provided sufficient training to facilitate implementation of applicable outreach, site visit, and inspection tasks.
- 4-9. Each Co-Permittee will document and report annual training, education, and coordination activities to the principal permittee using the MS4 Solution database.